

# CHRISTOPHER A. FERRARA

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June 23, 2021

**By Electronic Case Filing**

Honorable Daniel J. Stewart  
United States Magistrate Judge  
United States District Court for the  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, Room 112  
Albany, New York, 12207

**Re: *Soos, et al. v. Cuomo, et al* : 1:20-cv-00651-GLS-DJS  
Request for Pre-Motion Conference or Motion Date**

Dear Judge Stewart:

Plaintiffs seek to file a non-dispositive motion for leave to file and serve a Second Amended Complaint dropping parties and seeking permanent injunctive and declaratory relief, and also leave to apply for an interim award of attorney fees based on the preliminary injunction granted to plaintiffs on June 26, 2020, as to which appeals by the City and State defendants have been dismissed. The case has been settled as to the City defendants. *See* ECF No. 139. I have conferred with my remaining adversary, counsel for Governor Cuomo, but we have not been able to resolve or narrow the issues raised on this motion. Accordingly, pursuant to Local Rule 7.1(a)(2), I respectfully request a court conference or simply the assignment of a motion date.

Respectfully submitted,

s/ Christopher A. Ferrara

Special Counsel -Thomas More Society  
Counsel for Plaintiffs

c: Adrienne Kerwin, Esq.